

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

YVETTE LOCKHART-BEMBERY, *

*

Plaintiff *

*

v. *

* **C.A. NO. 04-10581-NMG**

TOWN OF WAYLAND POLICE DEPARTMENT, *

ROBERT IRVING, in his capacity as CHIEF OF *

THE WAYLAND POLICE DEPARTMENT and *

DANIEL SAURO, *

*

Defendants *

*

AFFIDAVIT OF JOEL P. SUTTENBERG

I, Joel P. Suttenberg, do hereby affirm and attest as follows:

1. My name is Joel P. Suttenberg and I am an attorney practicing law before the state and federal courts in Massachusetts.
2. I was formerly an assistant attorney general in 1974-1975. Currently I practice in the areas of employment discrimination and civil rights law.
3. I am familiar with billing rates in the Boston, Framingham and eastern Massachusetts area and find that \$275 an hour is a reasonable rate, certainly well within and perhaps somewhat below the mean for hourly rates charged by attorneys with comparable experience handling civil rights cases in the Federal Court.
4. I am familiar with Andrew Fischer and know that he has experience litigating a number of civil rights and police misconduct cases in the Federal Court and can attest that his hourly rate of \$275 an hour is a reasonable rate for an attorney of his knowledge and experience.

Signed and sworn under the pains and penalties of perjury this 17th day of February, 2006

/s/ Joel P. Suttenberg
Joel P. Suttenberg

lockhart/affjps